The Honorable Robert S. Lasnik

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DANIELLE LLERA,

Plaintiff,

v.

TECH MAHINDRA (AMERICAS) INC., a Delaware Corporation,

Defendant.

NO. 2:19-cv-00445-RSL

TECH MAHINDRA (AMERICAS)
INC.'S OPPOSITION TO
PLAINTIFF'S MOTION TO
DETERMINE SUFFICIENCY OF
DEFENDANT'S RESPONSES TO
REQUESTS FOR ADMISSION

NOTED FOR CONSIDERATION: May 14, 2021

Tech Mahindra (Americas) Inc. ("Tech Mahindra" or "Defendant") submits this Opposition to Plaintiff's Motion to Determine Sufficiency of Defendant's Responses to Requests for Admissions (the "Motion").

On April 22 and 27, 2021, Defendant advised Plaintiff that it will provide supplemental responses (in the form of an admission or denial) to all Requests for Admissions that are the subject of the Motion, i.e., RFA Nos. 1, 2, 3, 4, 7, 10, 11, 16, and 23 and 24. (*See* Sriv. Decl. ¶2; Dkt. 92). Plaintiff's Motion is thus moot, and the Court should deny an order compelling Defendant to "provide sufficient responses to Plaintiff's Requests for Admission, or in the alternative, deem the requests admitted." (Dkt. 92, at 7).

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4811-5556-6057.1

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1 **CONCLUSION** 2 Tech Mahindra respectfully requests that the Court deny Plaintiff's Motion to Determine Sufficiency of Defendant's Responses to Requests for Admissions. 4 DATED this 10th day of May, 2021. 5 By: /s/ Kristin Nealey Meier 6 Kristin Nealey Meier, WSBA #33562 7 RYAN, SWANSON & CLEVELAND, PLLC 1201 Third Avenue, Suite 3400 8 Seattle, Washington 98101-3034 Tel: (206) 464-4224; Fax: (206) 583-0359 9 kmeier@ryanlaw.com 10 By /s/ Mark A. Konkel 11 Mark A. Konkel (pro hac vice) Nidhi Srivastava (pro hac vice) 12 KELLEY DRYE & WARREN LLP 3 World Trade Center 13 175 Greenwich Street Tel: (212) 808-7800; Fax: (212) 808-7897 14 mkonkel@kelleydrye.com 15 NSrivastava@KelleyDrye.com 16 Attorneys for Defendant Tech Mahindra (Americas) Inc. 17 18 19 20 21 22 23 24 25 26

